UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

AIDA ELZAGALLY, as the wife	
of MSADDEK TUNALLI, deceased	
)
AYAH TUNALLI, as the daughter	
of MSADDEK TUNALLI, deceased et.al)
	Case No. 1:19-cv-00853-LMB-MSN
Plaintiffs)
)
)
)
KHALIFA HAFTAR, individually)
last known address in Libya	
·)
Defendant	

DECLARATION OF FAISAL GILL

- I, Faisal Gill, under penalty of perjury, and in accordance with 28 U.S.C. § 1746, declare as follows:
 - 1. I am the attorney of record for the Plaintiffs in this matter.
 - 2. The complaint specified that Plaintiffs sought damages in the amount of \$125,000,000.00.
 - 3. The summons and complaint were served upon Defendant by Mr. Mohamed Rashdi under Federal Rules of Civil Procedure 4(f)(2)(A) and Libyan law on November 25, 2019.
 - 4. Mr. Rashdi completed an affidavit of service which was filed with this Court.
 - 5. Thus, Defendant had until December 16, 2019 to file a responsive pleading.
 - 6. Defendant has not filed any responsive pleading yet.
 - 7. The Defendant is not a minor or incompetent.

- 8. Clerk of Court is requested to enter an order for default against the Defendant.
- 9. A draft order of default is attached.

Dated: January 8, 2020

Respectfully Submitted,

Faisal Gill

Faisal Gill (#VSB 93255) Gill Law Firm 1155 F Street NW Suite 1050 Washington DC 20005 202-570-8223 202-318-5331 (fax) fgill@glawoffice.com Counsel for Plaintiffs